## Jeffrey A. Rothman

Attorney at Law
315 Broadway, Suite 200
New York, NY 10007
Tel.: (212) 227-2980; Cell: (516) 455-6873
Fax: (212) 591-6343
rothman.jeffrey@gmail.com

November 10, 2016

## **By ECF To:**

Honorable Edgardo Ramos United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: Kayheem Lilly v. City of New York, et al.,

16 Civ. 322 (ER) (KNF)

Dear Judge Ramos:

I am counsel for Plaintiff in this action. I write to respectfully request, with opposing counsel's consent, a two week extension (until November 29, 2016) to file Plaintiff's fees and costs application in this matter, so that the parties can attempt to negotiate a settlement concerning the fees and costs that would avoid the necessity for the application. The parties have had an initial negotiation, but more time is needed for further negotiations to proceed through the Law Department's / Comptroller's bureaucracy than is presently available. The Judgment Pursuant to Rule 68 was entered on November 1, 2016, which makes Plaintiff's fees and costs application presently due on this coming Tuesday, November 15, 2016.

I thank the Court for its consideration in this matter.

Respectfully submitted,

/S/

Jeffrey A. Rothman

cc: Elissa Fudim, Esq. (by ECF)